2020 STOP Violence Against Women Grant Continuation Solicitation

Electronic Submission Deadline
April 14, 2021
5:00 p.m. MST

Table of Contents

Program Scope	3
Statutory Authority	3
Program Overview	3
20% Sexual Assault Set-Aside	3
Eligibility	4
Deadline	4
PGR Grants Management System (GMS)	4
Contact and Application Information	4
STOP Purpose Areas and Idaho Priorities	4
Idaho Priorities	4
Other Statutory Purposes Areas	5
Award Information	7
Term of the Award	7
Availability of Funds	7
Application Review Process	7
Award Administration – Reporting Requirements	7
Required Application Components	8
A. Program Narrative (limited to 16,000 characters, including spaces)	8
B. Goals, Objectives, and Performance Measures	9
C. Budget and Budget Detail Worksheet	10
D. Attachments	11
E. Assurances and Certifications	13
STOP Program Funds Can Be Used For:	13
Unallowable Activities	15
Fiscal Accountability	16
Additional Requirements and Guidelines	17
Grant Resources and Information	20
Application Checklist	21
Appendix A: Subawards FY 2019	22

STOP Violence Against Women Grant

(CFDA 16.588)

Program Scope

Activities supported by the Services* Training* Officers* Prosecutors (STOP) Formula Grant Program are determined by statute, federal regulations, and Office on Violence Against Women policies. If a subgrantee receives an award, the funded project is bound by the provisions of this solicitation; the Department of Justice (DOJ) Grants Financial Guide, including any updates; and the conditions of the subgrantee's award. The DOJ Grants Financial Guide serves as the primary reference manual to assist Office of Justice Programs (OJP), OVW, and COPS Office grantees and subgrantees in fulfilling their financial responsibilities as grant award recipients.

Statutory Authority

This program is authorized by 34 U.S.C. §§ 10441, 10446–10451.

Program Overview

The Idaho State Police (ISP) Planning, Grants, and Research (PGR) Department is the designated State Administering Agency (SAA) for the Services* Training* Officers* Prosecutors (STOP) Violence Against Women Formula Grant. This solicitation provides program and application guidelines for federal fiscal year (FFY) 2020 STOP funding, including guidelines for complying with requirements of the Violence Against Women Act (VAWA), as amended. By statute, STOP funds support communities in their efforts to develop and strengthen effective criminal justice strategies to combat violent crimes against women and to develop and responses to domestic violence, dating violence, sexual assault, and stalking. STOP funds continue to focus on the implementation of comprehensive strategies which are sensitive to the immediate and long-term needs and safety of victims, while holding offenders accountable for their crimes.

20% Sexual Assault Set-Aside

The 2013 Reauthorization of VAWA required 20% of a State's STOP allocation be set-aside for subgrant projects meaningfully addressing sexual assault across two (2) or more allocation categories (victim services, courts, law enforcement, and prosecution). Sexual assault includes stranger rape, acquaintance rape, alcohol or drugfacilitated rape, and rape within the context of an intimate partner relationship. Examples of programs are Sexual Assault Nurse Examiners (SANEs), Sexual Assault Forensic Examiners (SAFEs), Sexual Assault Response Teams (SARTs), or training.

There is <u>not</u> a separate continuation solicitation for the 20% Sexual Assault Set-Aside. All of the information in this RFP is applicable to both STOP and Sexual Assault Set-Aside subgrantees, unless otherwise noted. The four (4) Sexual Assault Set-Aside subgrantees are identified in Appendix A and <u>must</u> continue to meaningfully address sexual assault across two (2) or more STOP allocation categories.

Eligibility

The only eligible applicants for 2020 STOP continuation funding are STOP and Sexual Assault Set-Aside subgrantees awarded during the 2019 funding cycle (see Appendix A).

Deadline

Applications are due Wednesday, April 14, 2021 no later than 5:00 p.m. MST.

PGR Grants Management System (GMS)

Subgrantees must have an account in GMS in order to complete and submit STOP continuation applications. To create an account or sign in to GMS go to https://www.isp.idaho.gov/gms/.

Subgrantees are required to certify, via an electronic acceptance, that they are the signing authority, or have been delegated as such, by the chief executive officer of the applicant agency.

GMS WILL allow subgrantees to submit a continuation application WITHOUT all required components, so make sure all requirements are completed (see Application Checklist – pg. 23). A continuation application may be considered non-responsive if all required application components are not addressed or attached.

Contact and Application Information

If you have questions about applying for continuation funding or need assistance submitting an application, please contact PGR at 208-884-7040 or email pgr@isp.idaho.gov.

Instructions for completing the application are located in the Resources section of PGR's website http://www.isp.idaho.gov/pgr.

STOP Purpose Areas and Idaho Priorities

The purpose of STOP funding is to assist states and territories; state, local, and tribal courts (including juvenile courts); Indian Tribal governments; units of local government; victim service provider; and culturally- and population-specific organizations. Subgrants supported through this program **must** meet one or more of the 20 statutory purpose areas, seven (7) of which are Idaho's top priorities.

Idaho Priorities

The Idaho Planning Committee for the STOP Implementation Plan: 2017-2020 decided on **seven top priorities** for STOP funds.

- Developing, enlarging, or strengthening victim services and legal assistance programs, including sexual assault, domestic violence, stalking, and dating violence programs,
- Training law enforcement officers, judges, other court personnel, and prosecutors to more effectively identify and respond to violent crimes against women, including the crimes of sexual assault, domestic violence, stalking, and dating violence, including the use of nonimmigrant status under subparagraphs
 (U) and (T) of section 101(a)(15) of the Immigration and Nationality Act (8 U.S.C. 1101(a));

- Developing, enlarging, or strengthening programs addressing the needs and circumstances of Indian tribes in dealing with violent crimes against women, including the crimes of sexual assault, dating violence, stalking, and domestic violence;
- Developing, training, or expanding units of law enforcement officers, judges, other court personnel, and prosecutors specifically targeting violent crimes against women, including the crimes of sexual assault, dating violence, stalking, and domestic violence;
- Providing assistance to victims of domestic violence and sexual assault in immigration matters;
- Developing and implementing more effective police, court, and prosecution policies, protocols, orders, and services specifically devoted to preventing, identifying, and responding to violent crimes against women, including the crimes of sexual assault, dating violence, stalking, and domestic violence, as well as the appropriate treatment of victims;
- Supporting formal and informal statewide, multidisciplinary efforts, to the extent not supported by State funds, to coordinate the response of state law enforcement agencies, prosecutors, courts, victim services agencies, and other state agencies and departments, to violent crimes against women, including the crimes of sexual assault, domestic violence, stalking, and dating violence.

Other Statutory Purposes Areas

If the continuation project does not meet one of the Idaho Priorities listed above, then it **must** meet one of the following federal statutory purpose areas.

- Developing, installing, or expanding data collection and communication systems, including computerized systems, linking police, prosecutors, and courts or for the purpose of identifying, classifying, and tracking arrests, protection orders, violations of protection orders, prosecutions, and convictions for violent crimes against women, including the crimes of domestic violence, dating violence, sexual assault, and stalking.
- Supporting formal and informal statewide, multidisciplinary efforts, to the extent not supported by State
 funds, to coordinate the response of State law enforcement agencies, prosecutors, courts, victim
 services agencies, and other State agencies and departments, to violent crimes against women,
 including the crimes of domestic violence, dating violence, sexual assault, and stalking.
- Training of sexual assault forensic medical personnel examiners in the collection and preservation of
 evidence, analysis, prevention, and providing expert testimony and treatment of trauma related to
 sexual assault.
- Maintaining core victim services and criminal justice initiatives, while supporting complementary new initiatives and emergency services for victims and their families.
- Supporting the placement of special victim assistants (to be known as "Jessica Gonzales Victim
 Assistants") in local law enforcement agencies to serve as liaisons between victims of domestic violence,
 dating violence, sexual assault, and stalking and personnel in local law enforcement agencies in order to
 improve the enforcement of protection orders. Jessica Gonzales Victim Assistants shall have expertise in
 domestic violence, dating violence, sexual assault, or stalking and may undertake the following activities:
 - developing, in collaboration with prosecutors, courts, and victim service providers, standardized response policies for local law enforcement agencies, including the use of evidence-based indicators to assess the risk of domestic and dating violence homicide and prioritize dangerous or potentially lethal cases;
 - o notifying persons seeking enforcement of protection orders as to what responses will be provided by the relevant law enforcement agency;

- o referring persons seeking enforcement of protection orders to supplementary services (such as emergency shelter programs, hotlines, or legal assistance services); and
- taking other appropriate action to assist or secure the safety of the person seeking enforcement of a protection order.
- Providing funding to law enforcement agencies, victim services providers, and state, tribal, territorial, and local governments (which shall be known as the Crystal Judson Domestic Violence Protocol Program) to promote:
 - the development and implementation of training for local victim domestic violence service providers, and to fund victim services personnel, to be known as "Crystal Judson Victim Advocates," to provide supportive services and advocacy for victims of domestic violence committed by law enforcement personnel;
 - the implementation of protocols within law enforcement agencies to ensure consistent and effective responses to the commission of domestic violence by personnel within such agencies (such as the model policy promulgated by the International Association of Chiefs of Police "Domestic Violence by Police Officers: A Policy of the IACP, Police Response to Violence Against Women Project," July 2003); and
 - the development of such protocols in collaboration with state, tribal, territorial and local victim services providers and domestic violence coalitions.

Note: Any law enforcement, state, tribal, territorial, or local government agency receiving funding under the Crystal Judson Domestic Violence Protocol Program shall, on an annual basis, receive additional training on the topic of incidents of domestic violence committed by law enforcement personnel from domestic violence and sexual assault nonprofit organizations and, after a period of two years, provide a report of the adopted protocol to OVW (through PGR), including a summary of progress in implementing such protocol. As such, states and territories are responsible for ensuring that each subgrantee receiving funds under this purpose area will receive the required annual training. States are also responsible for ensuring that subgrantees submit their two-year report to OVW (vial PGR). States and territories **must** notify and provide OVW (via PGR) with a list of subgrantees awarded STOP funds under the Crystal Judson Domestic Violence Protocol Program.

- Developing and promoting State, local, or tribal legislation and policies that enhance best practices for responding to domestic violence, dating violence, sexual assault, and stalking:
- Developing, implementing, or enhancing Sexual Assault Response Teams, or other similar coordinated community responses to sexual assault.
- Developing and strengthening policies, protocols, best practices, and training for law enforcement agencies and prosecutors relating to the investigation and prosecution of sexual assault cases and the appropriate treatment of victims.
- Developing, enlarging, or strengthening programs addressing sexual assault against men, women, and youth in correctional and detention settings.
- Identifying and conducting inventories of backlogs of sexual assault evidence collection kits and developing protocols and policies for responding to and addressing such backlogs, including protocols and policies for notifying and involving victims.
- Developing, enhancing, or strengthening prevention and educational programming to address domestic violence, dating violence, sexual assault, or stalking, with not more than 5 percent of the amount allocated to a state to be used for this purpose.

Award Information

Term of the Award

STOP continuation projects awarded during the 2020 funding cycle represent the fourth year of continuation funding. Projects will start the day following the close of the current project cycle and operate for a year. Extensions beyond the one year project cycle must be requested via GMS no less than 30 days prior to the project cycle end date. PGR reviews extensions on a case-by-case basis.

Availability of Funds

The STOP allocation for Idaho increased in FFY 2020, however, all subgrantee award amounts will be the same as their FY2019 awards. Please construct your budget based on FY2019 award amounts.

The required 20% Sexual Assault Set-Aside is \$248,202. The projects awarded in FY2019 under the Sexual Assault Set-Aside (identified in Appendix A) <u>must</u> continue to meaningfully address sexual assault across two (2) or more allocation categories (victim services, courts, law enforcement, and prosecution).

The remaining \$765,075 is available to all other STOP subgrantees. Combined, the continuation funds will be allocated (per statutory requirement) into the following categories:

- 5% or \$55,845 to State and local courts, including juvenile courts;
- 25% or \$255,162 for law enforcement;
- 25% or \$238,503 for prosecutors; and
- 30% or \$296,825 for nonprofit, nongovernmental victim services.
 - 10% or \$37,230 of the FY20 funds allocated for victim services will be withheld and combined with previous years' funding to be distributed to culturally specific communitybased organizations.

Allocation categories for STOP applications are not determined by type of agency, rather by who benefits from project activities. Statutory allocation amounts may not be redistributed or transferred to other funding allocation categories. Discretionary funds (15%) are allocated at the discretion of the Idaho Grant Review Council.

Application Review Process

STOP continuation applications will be thoroughly reviewed by PGR and evaluated by the <u>Idaho Grant Review</u> <u>Council</u> on a pass/fail basis. Both PGR and the Council are committed to ensuring a fair and open process for awarding grants. Applications are reviewed to make sure the information presented is reasonable, understandable, allowable, measureable, achievable, and consistent with the solicitation.

Award Administration – Reporting Requirements

Subgrantees are required to submit quarterly expense, match, and progress reports in GMS, along with a yearly STOP Subgrantee Annual Performance Reports (SAPRs). STOP subgrantees are only required to report on the sections of the SAPR that pertain to their project **including** match activities. A copy of the SAPR is located at https://isp.idaho.gov/pgr/stop-vawa/.

Quarterly progress reports must also include updates on the goals, objectives, and performance measures identified by the STOP Implementation Planning Committee and listed in the Required Application Components section of this solicitation.

The due date for all reports is no later than the 15th day of the month following the end of each quarter.

Quarterly Reporting Periods	Due Dates
October – December	January 15 th
January – March	April 15 th
April – June	July 15 th
July - September	October 15 th

Required Application Components

A. Program Narrative (limited to 16,000 characters, including spaces)

When completing the Program Narrative, be sure to:

- Identify each numbered section,
- Spell out all acronyms at least once,
- Site data sources, and
- Address <u>all</u> sections below. If a section is not applicable to the STOP funded project, simply state N/A.

The Program Narrative **must** include:

- 1. Overview of the project.
- 2. Identify progress/successes/accomplishments during the current project cycle.
- 3. Identify expected accomplishments during the upcoming project cycle.
- 4. Provide <u>agency and project specific local data</u> from the current project cycle to show the impact of the project. The data suggestions below are just examples, as the data provided in the continuation application must specifically address the STOP funded project.
 - Number of domestic violence, sexual assault, dating violence, and stalking victims served.
 - Number of sexual assault exams conducted by SANEs or SAFEs.
 - Number and types of training conducted or attended. If training was conducted, include the number of attendees.
 - Number of Sexual Assault Response Team (SART) meetings and identify participating agencies.

Tip: Crime in can be obtained from the Crime in Idaho and Idaho Statistical Analysis Center websites:

https://nibrs.isp.idaho.gov/CrimeInIdaho/Home/Index and https://isp.idaho.gov/pgr/sac/

- 5. Address any modifications to the project, as well as obstacles encountered and solutions.
- 6. Identify services or programs addressing the needs of underserved populations and victims.
 - Number of underserved victims served during the current project cycle.
 - Demographic information (race, ethnicity, age, etc.) for the underserved victims.
- 7. Statement as to whether or not the subgrantee expended \$750,000 or more in federal funds during the subgrantee's previous fiscal year.
 - If yes, provide a link to the most current Single Audit report (please do <u>not</u> attach the report to the application), address any findings related to federal funds, and explain how the findings were resolved.

- 8. If the continuation project includes funding for assessing the effectiveness of STOP funded activities, the subgrantee must describe the assessment (pre- and post-testing, surveys, etc.) and provide the amount requested for such activities (cannot exceed 3% of total budget).
- 9. If the continuation project includes funding for prevention, the subgrantee must describe the prevention activity and provide the amount requested for such activities (cannot exceed 5% of total budget).

Tip: PGR highly recommends saving the Program Narrative in Word and pasting it into GMS, as not all web browsers have spell check and there is no character count in GMS.

B. Goals, Objectives, and Performance Measures

During the STOP Implementation Planning Committee meeting in 2017, the Committee set three (3) goals related to domestic violence, sexual assault, dating violence, and stalking and identified associated objectives and performance measures. The goals address underserved populations; coordinated, multidisciplinary responses (see page 8 for reporting instructions); and domestic violence related homicides. All STOP subgrantees must include the following goals, objectives, and performance measures in their continuation applications and report on the performance measure data quarterly. These are the same as last year. If these are not currently part of STOP funded activities, please incorporate as best as possible. Performance measure data must reflect quarterly figures, not cumulative, and should only include activities funded by STOP or those used as match. Please do not change any of the verbiage for the goals, objectives, or performance measures or include other goals, objectives, or performance measures. These are in addition to the quarterly SAPR reports, which must also be completed each quarter.

<u>Goal 1 Title</u>: Underserved Populations

<u>Goal 1 Narrative</u>: Implement community-driven initiatives to address the needs and issues faced by underserved populations impacted by domestic and sexual violence through victim services, training, and the development of protocols and/or policies.

Objective 1 Title: Coordination

<u>Objective 1 Narrative</u>: Improve coordination with underserved populations through meetings with representatives of the underserved populations.

Performance Measure Title: Outreach

<u>Performance Measure Narrative</u>: Number of outreach activities to underserved communities (including meetings with representatives).

Objective 2 Title: Protocols/Policies

<u>Objective 2 Narrative</u>: Increase the number of protocols and/or policies developed, substantially revised, or implemented concerning appropriate responses to underserved populations.

Performance Measure Title: Culturally Appropriate Protocols/Policies

<u>Performance Measure Narrative</u>: Number of culturally appropriate protocols or policies developed, revised, or implemented.

Objective 3 Title: Training

<u>Objective 3 Narrative</u>: Increase the number of trainings addressing the needs and/or appropriate responses to underserved populations.

Performance Measure Title: Training

<u>Performance Measure Narrative</u>: Number of people trained in the appropriate responses to underserved populations.

**Goal 2 Title: Domestic Violence Related Homicides

<u>Goal 2 Narrative</u>: Reduce domestic violence related homicides through an intensely concentrated and coordinated early response to high risk victims and clients.

Objective 1 Title: High Risk Cases

<u>Objective 1 Narrative</u>: Increase the identification of high risk cases with the use of risk assessments by law enforcement and victim services for domestic violence incidents and respond accordingly through the Idaho Risk Assessment of Dangerousness tool.

Performance Measure Title: Risk Assessments

Performance Measure Narrative: Number of risk assessments completed.

Objective 2 Title: Safety Planning

Objective 2 Narrative: Increase frequency or quality of safety planning with victims.

Performance Measure Title: Safety Planning

Performance Measure Narrative: Number of domestic violence victims receiving safety planning.

**STOP subgrantees funded out of the 20% Sexual Assault Set-Aside (see Appendix A) or who do not perform risk assessments or safety planning (courts, for example) are not required to include Goal 2 and the associated objectives and performance measures in their application.

C. Budget and Budget Detail Worksheet

The required Expense/Match Budget Detail Worksheet includes sections for calculations and narratives, and must be attached to the application as an Excel document. The Expense/Match Budget Detail Worksheet is located at https://isp.idaho.gov/pgr/stop-vawa/. The worksheet must contain a breakdown of all requested expenses and match. The requested budget must reflect as closely as possible all costs associated with the proposed project. If funded, adjustments to the budget can be made; however, all deviations from the final approved budget must be pre-approved by PGR. Please construct your budget based on your 2019 funding.

Budget Narratives Must:

- <u>Thoroughly</u> and <u>clearly</u> describe every expense and match item listed under each category. PGR expects proposed budgets to be complete, cost effective, and allowable (e.g., reasonable, allocable, and necessary for project activities).
- Include how funds will be allocated (if applicable) with other funding sources.
 For example, if a victim's advocate spends 30% of their time on STOP activities, only 30% of costs associated with the advocate can be covered by the STOP grant. This includes travel, equipment and supplies.
- Be mathematically sound and correspond with the information and figures provided in the Description and Calculation sections of each category.
- Explain how the subgrantee estimated and calculated all costs, and how they are relevant to the completion of the proposed project.

Once the Budget Detail Worksheet is completed, expense and match budget category totals must be entered in the Budget section (between Goals and Attachments tab) of the application.

Match Requirement

There is a 25% match requirement for STOP funds. Victim service providers and tribes cannot be required to provide match, however any match provided will assist PGR in meeting the 25% match requirement. For a victim service provider to qualify under this exclusion, the subgrantee must be recognized by the IRS under section 501(c)(3) of title 26. The following provisions apply to the match requirement:

- Match calculations and narratives, including identifying <u>match sources</u> (state or local funds, donations, etc.), and how matching funds will be used, must be included in the Budget Detail Worksheet.
- The match requirement may be satisfied with either cash (e.g., funds contributed from private sources or state and local governments) or in-kind (e.g., services or goods donated by the applicant organization or other entities).
- Funds from other federal sources cannot be used for match.
- Funds or in-kind resources used as match must be directly related to the STOP project.
- Subgrantees must maintain records which clearly show the source, amount, and timing of all matching contributions.
- Sources of match are restricted to the same requirements as funds allocated under STOP and must be documented in the same manner as STOP funds, including financial and programmatic reports.
- Formula for Calculating Match:
 - Award Amount ÷ 75% (federal share) = Adjusted Project Costs
 - Adjusted Project Costs x 25% (subgrantee share) = Required Match
- Further guidance on calculating and documenting match and ideas regarding match can be found in the Match Requirements for STOP Formula Grants.

D. Attachments

Required for all Subgrantees

- Confidentiality Notice Form: All subgrantees must comply with the confidentiality and privacy requirements of VAWA 2013. Applicants must sign and submit the acknowledgement form available on the OVW website:
 - http://www.justice.gov/sites/default/files/ovw/pages/attachments/2015/01/20/confidentiality_acknowledge_ment_form_42015.pdf
- **Letter of Nonsupplanting:** Subgrantees must submit a letter to Bea Hanson, Principal Deputy Director of OVW (via PGR), certifying that federal funds will not be used to supplant state or local funds. Sample letter located at https://www.justice.gov/ovw/resources-applicants.
- **Financial Accounting Practices:** Each subgrantee must prepare a response to all seven (7) of the following questions. PGR will review the subgrantee's responses to assist in evaluating the adequacy of the subgrantee's financial management system and to identify areas of need for training and technical assistance. The attachment must be no more than two (2) pages.
 - 1. Will all funds awarded under this program be maintained in a manner that they will be accounted for separately and distinctly from other sources of revenue/funding? Please provide a brief description of the organization's policies and procedures that ensure funds will be tracked appropriately.
 - 2. Does the subgrantee have written accounting policies and procedures? How often are these policies and procedures updated? Please provide a brief list of the topics covered in the organization's

- policies and procedures. PGR may request a copy for review during the application/award process or as part of the subgrant monitoring process.
- 3. Is the subgrantee's financial management system able to track actual expenditures and outlays with budgeted amounts for each grant or subgrant? Please provide a brief summary of the organization's process for tracking expenditures.
- 4. Does the subgrantee have procedures in place for minimizing the time between transfer of funds from ISP and disbursement for project activities? Please provide a short summary of the organization's policy for requesting payments for grant awards.
- 5. Does the subgrantee have effective internal controls in place to adequately safeguard grant assets and to ensure that they are used solely for authorized purposes? Please provide a brief description.
- 6. Does the subgrantee have a documented records retention policy? If so, briefly describe the policy.
- 7. Is the individual primarily responsible for fiscal and administrative oversight of grant awards familiar with the applicable grants management rules, principles, and regulations including the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, (2 CFR Part 200)? Please provide a short list of the individual's qualifications/experience. If the individual is not familiar with the applicable rules and regulations, the subgrantee must contact PGR immediately after the organization is notified of its award to coordinate training.
- 8. *New* Does the subgrantee or any of its employees have any potential personal or organizational conflicts of interest related to the possible receipt of OVW award funds? Applicants are required to disclose in writing any potential conflicts of interest to their awarding agency. See 2 C.F.R. § 200.112 and Chapter 3.20, Grant Fraud, Waste and Abuse, of the DOJ Financial Guide for additional information.
- 9. *New* Does the subgrantee currently require employees to maintain time distribution records that accurately reflect the work performed on specific activities or cost objectives in order to support the distribution of employees' salaries among subawards or other activities (2 C.F.R. § 200.430)? Budget estimates do not qualify as support for charges to subawards. Provide a brief description of the organization's established timekeeping policies and procedures.

Required if Applicable

- **Memorandum of Understanding:** A signed Memorandum of Understanding (MOU) must be submitted with the continuation application if the subgrantee is coordinating with another agency or organization to meet the proposed grant funded program activities.
- Legal Assistance for Victims Certification Letter: See page 18 for additional information.
- Indirect Cost Rate Agreement
- Disclosure of High Risk Status: Subgrantees currently designated high risk by another federal grant making
 agency must disclose that status. This includes any status requiring additional oversight by the federal
 agency due to past programmatic or financial concerns. If a subgrantee is designated high risk by another
 federal grant making agency, they must attach the following information to the application.
 - Federal agency which designated the subgrantee as high risk.
 - Date the subgrantee was designated high risk.
 - High risk point of contact name, phone number, and email address, from the federal agency.
 - Reason(s) for the high risk status.

PGR is requesting this information to ensure appropriate oversight of grant funding. Disclosing this high risk information does not disqualify any organization from receiving an award from PGR. However, additional grant special conditions may be included in the award document, such as increased monitoring or desk reviews and/or prohibitions on drawing funds until certain requirements are met.

Note: Any materials submitted as part of this application may be released pursuant to a request under the Freedom of Information Act.

E. Assurances and Certifications

These must be "signed" via an electronic acceptance by the executive official, or designee, representing the applicant agency. Each agency may designate a person to complete the application; however, this person must certify they have the authority to sign on behalf of the executive official.

- Standard Assurances
- Certifications regarding lobbying; debarment; suspension and other responsibility matters; and drugfree workplace requirements

Allowable Costs

Federal Financial Guidelines

Federal grants are governed by the provisions of the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR Part 200) applicable to financial assistance and the <u>DOJ Grants Financial Guide</u>. The Guide includes information on allowable costs, methods of payment, audit requirements, accounting systems, financial records, and outlines the successful administration of grant funds.

In general, STOP grants may support personnel; training; technical assistance; outreach; data collection; equipment costs to enhance the apprehension, prosecution, and adjudication of persons committing violent crimes against women; and to provide or improve services for victims.

STOP Program Funds Can Be Used For:

- Responding to domestic violence, dating violence, sexual assault, or stalking.
- Salaries of prosecutors, law enforcement officers, or judges are allowable costs if they are being paid to handle cases involving violence against women. If they are not working full time on violence against women cases, their time must be prorated.
- Services to victims ages 11 and older. Victims must have been age 11 or older at the time they were victimized.
- A child advocacy center if the funding only supports services for victims age 11 or older.
- Developing, enhancing, or strengthening prevention and educational programming to address domestic violence, dating violence, sexual assault, or stalking, with not more than **5 percent** of the amount allocated to a state. For example:
 - Funds may be used for media campaigns to educate the general public about violence against women, but it can be no more than 5% of the award.
 - Funds can be used in schools if the students are 11 years of age or older and are victims, or to provide information to students about services available to help victims.
- Services to men in the following circumstances:

- The program focuses on addressing sexual assault against men, women, and youth in correctional and detention settings.
- The program focuses on services and responses targeting male and female victims of domestic violence, dating violence, sexual assault, or stalking, whose ability to access traditional services and responses is affected by their sexual orientation or gender identity.
- Batters' Intervention Programs if the program is part of a graduated range of sanctions that use
 the coercive power of the criminal justice system to hold abusers accountable. However,
 couples counseling or any intervention that requires victim participation or that is not designed
 to hold offenders accountable cannot be supported. Batters' Intervention is typically under the
 courts allocation.
- Although other services to men may not be covered by STOP funding, a new nondiscrimination grant condition indicates that subgrantees may not exclude any person from receiving grant funded services on a number of prohibited grounds, including a person's sexual orientation, gender identity, and men who are similarly situated to female victims that the subgrantee ordinarily serves and who requests services.
- STOP funds can be used to provide services to incarcerated victims of domestic violence, dating
 violence, sexual assault, or stalking. Services must be limited to address the domestic violence, dating
 violence, sexual assault, or stalking victimization experienced by the incarcerated individual, including
 crimes experienced while incarcerated and crimes experienced at other points of their lives (at age 11 or
 older).
- Legal services for victims of domestic violence, dating violence, sexual assault, or stalking can be supported such as housing, family law, public benefits, and other similar matters (subgrantee must certify some conditions).
- To pay for health care providers' time conducting forensic examinations if 1) the exams are performed by specially trained SANEs or SAFEs and 2) the jurisdiction does not require victims of sexual assault to seek reimbursement from their insurance carriers.
- STOP can support the operational costs of a facility, such as a shelter but if the project is supported with funds from other sources as well, they must be prorated and the rent must be reasonable.
- To purchase equipment. If the equipment will be used for the STOP project, as well as other purposes, the expenses must be prorated according to the percentage of time that the equipment is used for STOP purposes. No vehicles can be purchased.
- Reasonable transportation costs can be covered that would enhance a woman's safety, including transporting a woman safely out-of-state.
- To pay for the first month's rent for a victim of domestic violence as part of the provision of transitional housing, as well as deposits if the subgrantee has an agreement in place with the landlord that the full/remaining deposit will be returned to the subgrantee and not the victim at the end of the lease.
- Food and beverages may be purchased under some guidelines; food within victim services is permissible if the food is necessary or integral to providing services to women to enhance their safety.
- Subgrantees must receive prior approval before generating program income through grant funded
 activities. Program income can be used to supplement or reduce project costs, and must be used on
 allowable program costs. It must be expended prior to requesting a draw and any unspent income must
 be returned to OVW.

• Can be used for developing/promoting policies and legislation that enhances best practices for responding to domestic violence, dating violence, sexual assault, and stalking.

Program Assessments

Subgrantees may not use any STOP funds to conduct research which is defined in 28 C.F.R. § 46.102 as a systematic investigation designed to develop or contribute to generalizable knowledge. Surveys and focus groups, depending on their design and purpose, may constitute research and therefore be out of scope. However, up to 3% of the budget may be allocated for the purpose of assessing their work for internal improvement purposes only, such as by convening a listening session to identify service gaps in the community, or surveying training participants about the quality of training content and delivery. For example, funds may be used to conduct pre- and post-testing of training recipients or for victim satisfaction surveys. In conducting such testing or surveys, subgrantees may not collect, analyze or disseminated any information that would disclose the identity of an individual. Applicants considering such assessments must refer to the OVW research decision tree in the Solicitation Companion Guide to ensure that the activity does not qualify as human subjects research.

Indirect Costs

According to the <u>DOJ Grants Financial Guide</u>, "Indirect costs are costs of an organization that are not readily assignable to a particular project, but are necessary to the operation of the organization and the performance of the project. Examples of costs usually treated as indirect include those incurred for facility operation and maintenance, depreciation, and administration salaries." Applicants with a current approved indirect cost rate must attach a copy of their indirect cost rate agreement to their application, if they are requesting reimbursement for indirect.

Exception: Units of local government who have not been assigned a cognizant federal agency by the Office of Management and Budget, are not required to submit their indirect cost proposal, unless required by the awarding agency. They are required to prepare and retain the proposal on file for review.

Non-federal entities, other than state and local governments and tribes, that have never received a federally approved indirect cost rate, may elect to charge a de minimis rate of 10% of the modified total direct costs (MTDC), which may be used indefinitely. The MTDC base includes all direct salaries and applicable fringe benefits, materials and supplies, services, and travel. The base excludes equipment, capital expenditures, charges for patient care, rental costs, tuition remission, scholarships and fellowships, and participant support costs. When using the MTDC method, costs must be consistently charged as either indirect or direct and must not be double charged or inconsistently charged as both. If this method is chosen, it must be used consistently for all federal awards until the non-federal entity choses to negotiate an indirect cost rate, which can be done at any time. See 2 C.F.R. § 200.414(2)

Indirect costs must be included in the "Other" budget category on the Budget Detail Worksheet. The calculation must include the indirect cost rate and the total direct costs used to determine indirect costs.

Unallowable Activities

The following is a list of unallowable activities and cannot be supported by STOP funding.

- Lobbying (except with explicit statutory authorization)
- Fundraising
- Purchase of Real Property
- Construction
- Physical modifications to buildings, including minor renovations (such as painting or carpeting)
- Placement of survivors in permanent housing after a shelter stay (including purchasing furniture or paying moving costs)
- Prevention activities exceeding 5% of award
- Services to children under age 11 (unless the children's services are of a secondary nature to the primary services provided to the adult victim or if children's services are complementary emergency services, such as serving child witnesses to domestic violence)

Supplanting Prohibition

STOP funds can be used to <u>supplement</u> existing state and local funds for program activities, but must <u>not</u> <u>replace</u> (supplant) those funds that have been appropriated for the same purpose and previously paid for by state or local funds. STOP subgrantees must submit a Letter of Nonsupplanting with their applications (see page 12).

Activities that Compromise Victim Safety and Recovery

The following activities have been found to jeopardize victim safety, deter or prevent physical or emotional healing for victims, or allow offenders to escape responsibility for their actions:

- Procedures or policies that exclude victims from receiving safe shelter, advocacy services, counseling, and other assistance based on their actual or perceived age, immigration status, race, religion, sexual orientation, gender identity, mental health condition, physical health condition, criminal record, work in the sex industry, or the age and/or gender of their children;
- Procedures or policies that compromise the confidentiality of information and privacy of persons receiving STOP funded services;
- Offering perpetrators the option of entering pre-trial diversion programs or placing batterers in anger management programs;
- Requiring mediation or counseling for couples as a systemic response to domestic violence or sexual assault, or in situations in which child sexual abuse is alleged;
- Requiring victims to report sexual assault, stalking, or domestic violence crimes to law enforcement or forcing victims to participate in criminal proceedings;
- Relying on court-mandated batterer intervention programs that do not use the power of the criminal justice system to hold batterers accountable for their behavior; or
- Supporting policies or engaging in practices that impose restrictive conditions to be met by the victim in order to receive services (e.g., attending counseling, seeking an order of protection).

Fiscal Accountability

Commingling of funds on either a program-by-program or project-by-project basis is prohibited. The subgrantee's accounting system must maintain a clear audit trail for each source of funding for each fiscal budget period and include the following:

- Separate accountability of receipts, expenditures, disbursements, and balances. PGR recommends
 creating an account in your accounting system for each grant using the subgrant number provided by
 PGR on the subaward document.
- Itemized records supporting all grant receipts, expenditures, and <u>match contributions</u> in sufficient detail to show exact nature of activity.
- Data and information for each expenditure and match contribution with proper reference to a supporting voucher or bill properly approved.
- Hourly timesheets describing work activity, signed by the employee and supervisor, to document hours
 personnel worked on grant related activities. <u>Match hours must be documented in same manner</u>.
- Maintenance of payroll authorizations and vouchers.
- Maintenance of records supporting charges for fringe benefits.
- Maintenance of inventory records for equipment purchased, rented, and contributed.
- Maintenance of billing records for consumable supplies (i.e., paper, printing) purchased.
- Provisions for payment by check.
- Maintenance of travel records (i.e., approved travel requests, mileage logs, and gas receipts).
- Lease agreements, contract services, and purchases of equipment that adhere to established procurement processes.

Compliance with OVW Financial Requirements – All STOP subgrantees must agree to follow the financial and administrative requirements in the <u>DOJ Grants Financial Guide</u> as a condition of receiving grant funding. The DOJ Grants Financial Guide includes information on allowable costs, methods of payment, audit requirements, accounting systems, and financial records. This document outlines the successful administration of grant funds. If PGR determines a current subgrantee has violated any of the requirements of the Guide, the subgrantee's award may be frozen or terminated and the subgrantee may be denied continued funding.

Subgrantees are responsible for monitoring contracts, including MOU partner activities, under the grant in accordance with all applicable statutes, regulations, OMB circulars and guidelines, and the DOJ Grants Financial Guide. Subgrantees are responsible for oversight of partner spending and monitoring specific performance measures and outcomes attributable to the use of STOP funds.

Additional Requirements and Guidelines

Subgrantees funded by the Idaho Grant Review Council must agree to comply with additional legal requirements upon acceptance of an award. PGR strongly encourages subgrantees to review the information pertaining to these additional requirements prior to submitting an application. Award conditions are found at: https://www.justice.gov/ovw/award-conditions.

NOTE New Award Condition: Policy for response to workplace-related sexual misconduct, domestic violence, and dating violence (PDF)

Nondisclosure of Confidential and Private Information – Subgrantees must have policies and procedures in place that protect the confidentiality and privacy of persons receiving services. Absent informed, written, reasonably time-limited consent, agencies must not disclose, reveal, or release any personally identifying information or individual information collected in connection with services requested, utilized, or denied

through a subgrantee program regardless of whether the information is encoded, encrypted, hashed, or otherwise protected. The term 'personally identifying information' or 'personal information' means individually identifying information for or about an individual. This includes information likely to disclose the location of a victim of domestic violence, dating violence, sexual assault, or stalking, including:

- first and last name;
- home or other physical address;
- contact information (including postal, e-mail, or Internet protocol addresses, and telephone or facsimile number);
- social security number, driver's license number, passport number, or student identification number; and
- any other information, including date of birth, racial or ethnic background, or religious affiliation that would serve to identify any individual.

Legal Assistance - Subgrantees can provide a full range of legal services, such as housing, family law, public benefits, and other similar matters with STOP funding. Before receiving funds, a subgrantee providing legal assistance must certify, via a Legal Assistance for Victims Certification Letter (sample letter at http://www.ovw.usdoj.gov/docs/sample-cert-letter.pdf), that:

- 1. any person providing legal assistance with STOP funds
 - A. has demonstrated expertise in providing legal assistance to victims of domestic violence, dating violence, sexual assault, or stalking in the targeted population; or
 - B. (i) is partnered with an entity or person that has demonstrated expertise described in subparagraph (A); and
 - (ii) has completed, or will complete, training in connection with domestic violence, dating violence, stalking, or sexual assault and related legal issues, including training on evidence-based risk factors for domestic and dating violence homicide;
- 2. any training program conducted in satisfaction of the requirement of paragraph (1) has been or will be developed with input from and in collaboration with a tribal, state, territorial, or local domestic violence, dating violence, sexual assault, or stalking victim service provider or coalition, as well as appropriate tribal, state, territorial, and local law enforcement officials;
- any person or organization providing legal assistance with funds through the STOP program has
 informed and will continue to inform state, local, or tribal domestic violence, dating violence, sexual
 assault, or stalking programs and coalitions, as well as appropriate state and local law enforcement
 officials of their work; and
- 4. the subgrantee's organizational policies do not require mediation or counseling involving offenders and victims physically together, in cases where sexual assault, domestic violence, dating violence, or child sexual abuse is an issue.

Violence Against Women Act Non-Discrimination Provision – The VAWA Reauthorization of 2013 added a new civil rights provision, which applies to all 2019 STOP subgrantees. This provision prohibits STOP subgrantees from excluding, denying benefits to, or discriminating against any person on the basis of actual or perceived race, color, religion, national origin, sex, gender identity, sexual orientation, or disability in any program or activity funded in whole or in part by STOP. For more information on this prohibition, see http://www.justice.gov/sites/default/files/ovw/legacy/2014/06/20/faqs-ngc-vawa.pdf.

Equal Opportunity/Civil Rights Compliance – Subgrantees must abide by all federal and state laws, rules, and regulations, as well as executive orders issued by the Governor of the State of Idaho pertaining to equal employment opportunities. Subgrantees will comply (and will require any contractors to comply) with any applicable federal discrimination requirements. Subgrantees will provide an Equal Employment Opportunity Plan (EEOP) to the Office for Civil Rights, Office of Justice Programs and PGR, if required. No EEOP is required for subgrantees receiving less than \$25,000, or with fewer than 50 employees, regardless of the amount of the award. Information about civil rights obligations of subgrantees can be found at www.ojp.usdoj.gov/ocr/.

Accommodations and Language Access – STOP subgrantees must comply with applicable federal civil rights laws, which, among other things, prohibit discrimination on the basis of disability and national origin. This includes taking reasonable steps to ensure that persons with limited English proficiency (LEP) have meaningful access to subgrantees' programs or activities. More information on these obligations is available in the OVW FY 2014 Solicitation Companion Guide. Subgrantees are encouraged to allocate grant funds to support activities that help to ensure individuals with disabilities, Deaf individuals, and persons with limited English proficiency have meaningful and full access to their programs. Among the factors to be considered in determining what constitutes reasonable steps to ensure meaningful access are: (1) the number or proportion of LEP persons in the eligible service population; (2) the frequency with which LEP individuals come into contact with the program; (3) the importance of the service provided by the program; and (4) the resources available to the recipients. For example, grant funds can be used to support American Sign Language (ASL) interpreter services, language interpretation and translation services, or the purchase of adaptive equipment. Applicants proposing to use grant funds to create websites, videos and other materials must ensure that they are accessible to persons with disabilities. Grant funds may be allocated for these purposes. Additional assistance and information regarding LEP obligations can be found at www.lep.gov.

In accordance with federal civil rights laws, the subgrantee shall not retaliate against individuals for taking action or participating in action to secure rights protected by these laws.

No Copyright Restrictions - All materials developed under a STOP award must be without copyright restrictions.

Nonprofit Organization Requirement - Any entity that is eligible for a STOP subgrant based on its status as a nonprofit organization must be an organization that is described in section 501(c)(3) of the Internal Revenue Code of 1986 and is exempt from taxation under section 501(a) of that Code (See 42 U.S.C. § 13925(b)(16)(B)). This applies to STOP subgrantees under the 10% victim services set-aside for culturally specific community-based organizations, except for subgrantees that are tribal governmental organizations. In addition, victim service providers may need 501(c)(3) status in order to qualify for match exemptions.

Food and Beverage/Costs for Refreshments and Meals - Generally food and beverage costs are **not** allowable, and under no circumstances may STOP funding be used to supply food and/or beverages during refreshment breaks. STOP funds may be used to provide food and/or beverages for a meal at a meeting, conference, training, or other event, if one of the following applies:

- The location of the event is not in close proximity to food establishments. It should be a priority to try to secure a location near reasonably priced and accessible commercial food establishments.
- Not serving food will significantly lengthen the day or necessitate extending the meeting to achieve meeting outcomes.

- A special presentation at a conference requires a plenary address where there is no other time for food to be obtained.
- Other extenuating circumstances necessitate the provision of food.

Conference Planning and Expenditure Limitations - Subgrantees should be aware of all applicable laws, regulations, policies, and guidance (including specific cost limits, prior approval, and reporting requirements, where applicable) governing the use of federal funds for expenses related to conferences (which includes meetings, retreats, seminars, symposiums, training, and other similar events), including the provision of food and/or beverages at such events, and costs of attendance at such events. Information on pertinent laws, regulations, policies, and guidance is available at http://www.ovw.usdoj.gov/grantees.html. Subgrantees should also be aware of the following specific restrictions on conference planning and expenditure limitations:

- Cost of Logistical Conference Planning
- Cost of Programmatic Conference Planning
- Conference Space and Audio-Visual Equipment and Services
- Prohibition on Trinkets at Conferences
- Entertainment at Conferences
- Food and Beverages at Conferences
- Prior Approval Required Before Entering into Contracts or Expending Funds for Conferences
- Conference Reporting

Updated DOJ and OVW guidance on conference planning, minimization of costs, and conference cost reporting is accessible on the OVW website http://www.ovw.usdoj.gov/grantees.html. For additional information regarding food and beverage regulations, please refer to the DOJ Grants Financial Guide.

Additional Resources for applicants are listed at: https://www.justice.gov/ovw/resources-applicants

Grant Resources and Information

Applicants can always contact PGR for additional information and/or help with this solicitation at any time during the application process as well as visiting the <u>PGR website</u> for information, publications, and grant writing under <u>Resources</u>.

Application Checklist

A. Program Narrative

- 1. Overview
- 2. Progress/Successes/Accomplishments
- 3. Expected Accomplishments
- 4. Agency/Project Specific Local Data
- 5. Modifications
- 6. Underserved Populations
- 7. Fiscal Year Federal Spending
- 8. Project Assessment
- 9. Prevention

B. Goals, Objectives, and Performance Measures

C. Budget and Budget Detail Worksheet

- Match amounts, narratives, and sources must be identified on the Budget Detail Worksheet.
- Budget worksheet must be attached to the application as an **Excel** document.
- Sexual Assault Set-Aside subgrantees <u>must</u> meaningfully address sexual assault across two (2) or more STOP allocation categories (victim services, courts, law enforcement, and prosecution).

Attachments

- Required for all STOP Subgrantees
 - Confidentiality Notice Form at: https://www.justice.gov/ovw/resources-applicants This form must be signed.
 - Letter of Nonsupplanting Sample Letter at: https://www.justice.gov/ovw/resources-applicants
 - Financial Accounting Practices
- Required if Applicable
 - Memorandum of Understanding
 - Legal Assistance for Victims Certification Letter Sample Letter at: https://www.justice.gov/ovw/resources-applicants
 - Indirect Cost Rate Agreement
 - Disclosure of High Risk Status

D. Assurances and Certifications – Electronically Accepted

- Standard Assurances
- Certifications regarding lobbying; debarment; suspension and other responsibility matters; and drugfree workplace requirements

GMS WILL allow subgrantees to submit a continuation application WITHOUT all required components, so subgrantees should make sure all requirements are completed. A continuation application may be considered non-responsive if all required components are not addressed or attached.

Appendix A: Subawards FY 2019

Project Title	Agency	2019 Award Amounts
SANE/SART Coordinator	Idaho State Police	\$116,051
Sexual Assault Response and Prevention	Safe Passages	\$46,100
Montpelier PD SART Team Coordination	Montpelier Police Department	\$29,634
SAFE Services in Canyon County	Nampa Family Justice Center	\$59,313
ILAS, NFJC, WCA, Services for Survivors Partnership	Idaho Legal Aid Services, Inc.	\$38,929
Strengthening Services to Victims of Sexual Assault/Domestic Violence	Women's and Children's Alliance	\$109,538
Expanding Services to Underserved Populations and CCR	Family Safety Network	\$83,021
Montpelier PD Victim's Assistance STOP	Montpelier Police Department	\$80,029
Victim Services Advocate	Coeur d'Alene Police Department	\$67,341
Court-Based Advocacy and Prevention Education	Safe Passages	\$61,543
Collaborative Victim Services at the NFJC	Nampa Family Justice Center	\$65,723
Rural and Culturally Specific Services	The Advocates	\$50,834
Pretrial Victim Participation Program	Shoshone Co Prosecuting Attorney's Office	\$57,249
Rural Outreach Service Enhancement (ROSE) Project	Rose Advocates	\$94,305
Boise County VWC	Boise County Prosecutor	\$45,441
Judicial Education & Language Access Enhancement Project	Idaho Supreme Court	\$55,151

Highlighted Programs are Sexual Assault Set-Asides and must continue to meaningfully address sexual assaults.